

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In Re: ELIZABETH THOMAS	§	
	§	
	§	
JAMES ALLEN AND ROBERT L THOMAS	§	
Plaintiffs	§	
vs	§	
McCARTHY & HOLTHUS LLP,	§	
ON BEHALF OF FLAGSTONE LENDING	§	
GROUP A NON-EXISTENT A UTAH	§	
CORPORATION, AND	§	Adversary Cause No. 22 AP 03024 Debtor
	§	
SUCCESSOR/ASSIGNEE J.P. MORGAN	§	
CHASE BANK N.A. and ELIZABETH	§	
THOMAS	§	
Defendants	§	
_____	§	
	§	
PRIMARY RESIDENTIAL MORTGAGE INC.	§	
Intervenor/Defendant	§	
vs.	§	
ELIZABETH THOMAS	§	
Defendant	§	

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**COLLEEN MCCLURE'S FIRST AMENDED EXHIBIT LIST  
ON ELIZABETH THOMAS MOTION FOR SANCTIONS**

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**TO THE HONORABLE COURT:**

**COMES NOW** Colleen M. McClure who hereby provides the following first amended exhibit list in Response to the Motion for Sanctions:

**Exhibit** "A" - Docket 55-1 Verified Motion filed by Elizabeth Thomas

**Exhibit** "B" – Docket 55-2 Email from Elizabeth Thomas Pro Se Cause No 2017-76078; In the 127th Judicial District of Harris County, Texas

**Exhibit**-“C” – Docket 55-3 Order of Withdrawal in 2017-76078 and Consolidated Cases

**Exhibit** “D” – Docket 55-5 Response to Motion contesting withdrawal in 2017-76078

**Exhibit** “E” – Docket 55-5 Signed Declaration of Robert L. Thomas in US Southern District Cause No. 19-CV-00323

**Exhibit** “F” – Docket 55-6 Emails from Elizabeth Thomas

**Exhibit** “G” – Docket 55-7 Removal to New York to Elizabeth Thomas’ bankruptcy

**Exhibit** “F” – Docket 55-8 Removal to New York to Elizabeth Thomas’ bankruptcy

**Exhibit** “G” – Docket 55-9 Joint letter of representation by James Andersen and Colleen McClure in Harris County District Court Cause No. 2017-82388

**Exhibit** “L” – Docket 55-11 Emails James Andersen

**Exhibit** “M” – Docket 55-13 Joint Notice of Removal to Federal Court

**Exhibit** “N” – Docket 55-14 Elizabeth Thomas Notice of Removal to Federal Court

**Exhibit** “O” – Docket 54-15 Affidavit of James Allen

**Exhibit** “P” – Docket 54-16 Joint Petition in Cause No. 2016-87941

**Exhibit** “Q” – Docket 54-17 Docket Sheet in Cause No. 2018-14171

**Supplemented Exhibit A** – Docket 64-1 Emails James Anderson regarding Appeal

**Supplemented Exhibit A-1** – Docket 64-2 Email Elizabeth Thomas

**Supplemented Exhibit B** – Docket 64-3 Emails Elizabeth Thomas Threatening

**Supplemented Exhibit C** – Docket 64-4 Emails James Anderson regarding cases

**Supplemented Exhibit D** – Docket 64-5 Emails James Anderson regarding withdrawal and his signature needed as he was counsel for Elizabeth Thomas

**Supplemented Exhibit E** – Docket 64-6 Docket Sheet of lower court case number 2016-87941 showing counsel for parties

**Supplemented Exhibit F** – Docket 64-7 Docket Sheet of lower court case number 2014-54729 showing counsel for parties

**Supplemented Exhibit G** – Docket 64-8 Elizabeth Thomas emails

**Supplemented Exhibit H** – Docket 64-9 Emails regarding the appeal to the US Circuit Court of Appeals

**Supplemented Exhibit I** – Docket 64-10 Elizabeth Thomas threatening emails

**Supplemented Exhibit J** – Docket 64-11 Emails and letter regarding alleged race discrimination by Miramar Lakes HOA

**Supplemented Exhibit K** – Docket 64-12 Emails with James Andersen regarding Representation Agreement with the returned signed agreement with two different dates

**Supplemented Exhibit L** – Docket 64-13 Nineth Amended Petition in all cases in Harris County

**Supplemented Exhibit M** – Docket 64-14 Certified Copy of Order of Withdrawal affirming that Colleen McClure was not counsel for Elizabeth Thomas.

**Supplemented Exhibit N** – Docket 64-12 Lawsuit filed by Elizabeth Thomas against James Andersen.

**Rebuttal Exhibit O** - Emails from James Andersen – representation and lead counsel

Colleen McClure has served all documents on Elizabeth Thomas previously with the responses filed. All exhibits relate back to the US Southern District of Texas Docket Number.

Colleen McClure reserves the right to use any potential rebuttal exhibits and any other exhibits filed and attached to responses and supplemented responses that have not been specifically stated herein.

Respectfully submitted,

**COLLEEN M. McCLURE**  
**ATTORNEY AT LAW**

By: /s/ Colleen M. McClure

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above foregoing Response has been sent to Elizabeth Thomas via email on July 30, 2024.

/s/ Colleen M. McClure

**COLLEEN M. MCCLURE**